

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
AUDLEY REID

Petitioner

No. 25-CV-0904 (RER) (JRC)

-against-

ANSWER

NINA REMEKIE,

Respondent
-----X

The Respondent NINA REMEKIE, by and through her attorneys BARROWS LEVY PLLC, respectfully represents as follows, as and for her Answer to the Petition filed herein:

1. The Respondent admits the allegations contained within Paragraphs “2,” “7,” “9,” “10,” “11,” “12,” “22,” “30” and “46” of the Petition.
2. The Respondent admits the allegations contained within Paragraph “18” of the Petition except to the extent that the Respondent denies so much thereof as alleges “unlawful abduction.”
3. The Respondent denies each and every allegation contained within Paragraphs “13,” “15,” “16,” “25,” “26,” “27,” “32,” “33,” “34” and “40” of the Petition and leaves the Petitioner to his proof thereof.
4. The Respondent denies knowledge or information sufficient to form a belief as to the truth of the allegations contained within Paragraphs “1,” “3,” “4,” “5,” “6,” “8,” “14,” “17,” “19,” “20,” “21,” “23,” “24,” “28,” “29,” “31,” “35,” “36,” “37,” “38,” “39,” “41,” “42,” “43,” “44,” “45,” “47,” “48” and “49” of the Petition and leaves the Petitioner to his proof thereof.

FIRST SPECIAL DEFENSE

5. The Petitioner comes before this Court with unclean hands, thereby forfeiting his right to obtain any equitable relief.

SECOND SPECIAL DEFENSE

6. The Petitioner’s claim for relief is equitably barred by reason of his own affirmative, knowing and willful misconduct.

THIRD SPECIAL DEFENSE

7. The Petitioner has conducted himself in such a manner so as to pose a threat to the health, safety and overall physical, mental and emotional well-being of the Minor Children.

FOURTH SPECIAL DEFENSE

8. The legal custody of the Minor Children who are at issue herein has not been established by any court of competent jurisdiction and thus the Petitioner has no greater rights regarding legal custody of the Minor Children than those rights are enjoyed by the Respondent.
9. The Respondent expressly reserves unto herself the right to amend or to otherwise supplement this Answer as the circumstances may dictate.

Dated: March 7, 2025
Queens, New York



NINA REMEKIE

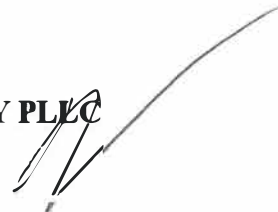
In accordance with the provisions of 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 7, 2025



NINA REMEKIE

BARROWS LEVY PLLC



By: _____

MICHAEL C. BARROWS, ESQ. (MCB5916)
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Dated: March 7, 2025

Queens, New York



NINA REMEKIE

In accordance with the provisions of 28 USC § 1746, I declare under penalty of perjury that the foregoing is true and correct.

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